

September 15, 2009

Mr. Mike McKeever, Chair
Regional Targets Advisory Committee

Re. RTAC Member Stephen Doyle's comments on September 9 Draft Working Report

Dear Mike:

Please accept that following comments related to the September 9 Draft Working Report:

- Where "Performance Monitoring" is discussed, "Housing production performance measures" should be added to the list of items to monitor (page 11)
- As you know from my September 2 comments, it is my position that it is inappropriate to include as RTAC recommendations or discussion items, those things which were not, in fact, discussed at RTAC meetings or put forth as recommendations. To that end, I must reiterate my opposition to the inclusion of an Indirect Source Review (ISR) and New Regional Authority to Raise Revenues in the report. Although I appreciate staff's attempt to reflect that these new items were not recommended by the RTAC, the current wording does not accurately capture that both of these items were never discussed at the RTAC meetings and only surfaced during the report drafting. As you know, there are numerous legal and policy battles that are unresolved related particularly to the ISR and, with our strongly held position that the ISR is an ineffective mitigation strategy, these issues deserved a full discussion before being included in the RTAC report.
- Also, on pages 39 and 40: "Flexibility in Designing Strategy", a more accurate reflection of the timeline for development projects would be seen with the following edits:

The Committee discussed that even in regions that are able to move efficiently through this process, development projects in response to the SCSs and APSs would be built in about the ~~middle~~-end of the next decade. If a region were delayed in getting through the se steps, the projects would come in beyond 2020. In light of this, regions will need the flexibility to employ a suite of greenhouse gas reduction measures in order to meet the 2020 targets. Nonetheless, land use changes will clearly realize a greater greenhouse gas reduction benefit for the 2035 target and such changes should begin as soon as possible to maximize those future benefits.

Regards,

Stephen Doyle
RTAC Member